Norlite Corporation

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FAX: (518) 235-0233

March 19, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 02/27/12 – 03/13/12
Kiln 2: 03/06/12 – 03/13/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 02/27/12 thru 03/13/12. The attached document explains each of the "malfunctions" for Kiln One & Two.

The results of the investigation concluded the majority of the exceedances were a result of the span limit associated with the stack gas flow monitor. Norlite conducted several inspections of the scrubber system and stack gas probes but did not find anything which would suggest the cause of the malfunction. Norlite believes water droplets from the mist pad to be the culprit. Norlite has arranged a meeting with its consultant and a vendor to review new technology which may be suitable for use at Norlite. Norlite feels there is great promise for this new technology. If it is determined this is a suitable application, Norlite will approach the Department for approval for installation. Norlite and its consultant will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments

DCL: 2410

Norlite Corporation

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
02/27/12 - 03/13/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/8/2012	16:55:02	3/8/2012	16:55:18	0:00:16	41	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
03/06/12 - 03/13/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/8/2012	16:55:03	3/8/2012	16:56:34	0:01:31	125	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
3/9/2012	13:27:28	3/9/2012	13:28:08	0:00:40	126	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/9/2012	13:31:39	3/9/2012	13:33:29	0:01:50	127	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / I & E Cleaned Stack Gas Probe	Stack Gas Flow Rate	Span	I & E Cleaned Probe
3/10/2012	2:06:57	3/10/2012	2:07:43	0:00:46	128	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/10/2012	4:26:11	3/10/2012	4:26:47	0:00:36	129	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/10/2012	4:49:24	3/10/2012	4:49:47	0:00:23	130	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/10/2012	5:35:03	3/10/2012	5:35:39	0:00:36	131	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/10/2012	5:41:13	3/10/2012	5:41:34	0:00:21	132	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/10/2012	6:31:33	3/10/2012	6:32:33	0:01:00	133	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/10/2012	9:49:57	3/10/2012	11:08:08	1:18:11	134	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/11/2012	3:48:27	3/11/2012	3:49:03	0:00:36	135	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/11/2012	4:02:49	3/11/2012	4:03:17	0:00:28	136	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow

3/11/2012	4:15:51	3/11/2012	4:16:51	0:01:00	137	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/11/2012	4:31:26	3/11/2012	4:32:32	0:01:06	138	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/11/2012	4:48:42	3/11/2012	4:49:07	0:00:25	139	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/11/2012	7:11:37	3/11/2012	7:31:57	0:20:20	140	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/11/2012	7:41:03	3/11/2012	7:57:45	0:16:42	141	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/13/2012	2:54:38	3/13/2012	2:55:56	0:01:18	142	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns